

APPLICANT(S): SHARONI, David  
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### REMARKS

The present response is intended to be fully responsive to all points of objection and/or rejection raised by the Examiner and is believed to place the application in condition for allowance. Favorable reconsideration and allowance of the application is respectfully requested.

Applicants assert that the present invention is new, non-obvious and useful. Prompt consideration and allowance of the claims is respectfully requested.

### Status of Claims

Claims 1-18 are pending in the application. Claims 1 - 18 have been rejected. Claims 1, 3, 8, 10, 11, 12 and 18 have been amended. Claim 9 has been cancelled without prejudice. have been amended. New claims 19 and 20 have been added. Applicants respectfully assert that no new matter has been added.

### CLAIM REJECTIONS

#### 35 U.S.C. § 102 Rejections

In the Office Action, the Examiner rejected claims 1, 4-18 under 35 U.S.C. § 102(e), as being anticipated by Fernandez et al. (U.S. Patent No. 6,697,103).

As is well established, in order to successfully assert a *prima facie* case of anticipation, the Examiner must provide a single prior art document that includes every element and limitation of the claim or claims being rejected.

Amended claim 10 recites: "*installing a content-analysis application into a video or audio processing unit from an application bank having content-analysis applications according to said alert received from said processing unit or another processing unit coupled to said application bank.*"

Amended claim 18 recites: "*instructing said application bank to install at least one of said content-analysis applications into at least one of said processing units based on said notification*".

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Amended claim 1 recites: *"a controller... able to instruct said application bank to install at least one of said content-analysis applications into at least one of said processing units based on an alert received from one or more of said processing units."*

Amended claim 8 recites: *"said control unit able to instruct said application bank to install one of said applications into said processing unit based on said alert."*

Fernandez at al. does not teach, either expressly or inherently, all the elements of independent claims 1, 8, 10 and 18. In particular, Fernandez at al. does not disclose at least *"installing a content-analysis application ... according to said alert received from said processing unit or another processing unit",* as recited in claim 10, *"instructing said application bank to install at least one of said content-analysis applications into at least one of said processing units based on said notification",* as recited in claim 18, *"to install at least one of said content-analysis applications into at least one of said processing units based on an alert received from one or more of said processing units",* as recited in claim 1, and *"instructing said application bank to install at least one of said content-analysis applications into at least one of said processing units based on said notification",* as recited in claim 8.

Fernandez discloses a single central controller 6, which is coupled to a plurality of fixed detectors via Internet 8. Fernandez further discloses a mobile set of target units 4 closely associated or attached to certain objects 2 for monitoring thereof. Controller 6 and target unit 4 may include software 66 having one or more modules for execution by processor 58 in target unit 4 and/or controller 6. The software modules are not dynamically installable to various processing units.

In the Office Action, the Examiner contends that Fernandez et al. discloses *"a control unit coupled to said processing units and to said application bank, said control unit able to instruct said application bank to install at least one of said applications into at least one of said processing units"* by referring to column 8, lines 35-38 of Fernandez, which recites *"(additionally software 66 therein includes) ... innovative instruction code and any related firmware or circuitry/equipment for analyzing and/or processing data according to preferred embodiment one or more of the following functional modules, as described further herein:"*.

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Applicants respectfully submits that the above quotation does not describe any operation related to installation of an application from an application bank and in particular it does not teach or suggest "installing a content-analysis application ... according to said alert received from said processing unit or another processing unit", as recited in claim 10.

Furthermore, in column 8, lines 44-45, Fernandez specifically discloses that "such modules are generally user customizable and adaptable according to particular need for object surveillance". Moreover, in lines 52-54, Fernandez discloses that "to improve program performance, one or more of such modules may be omitted or uninstalled from controller". Fernandez is silent as to the option of dynamically installing applications during surveillance and in particular Fernandez is silent as to installing an application "according to said alert received from said processing unit".

Similar arguments apply to claims 18, 1 and 8.

Accordingly, applicants respectfully submit that claims 1, 8, 10 and 18 are allowable and request that the rejection to these claims be withdrawn.

Claims 2, 4- 7 and 11 - 17 are dependent, directly or indirectly, from one of claims 1 and 10, and include all the limitations of the parent claim. Therefore, the patentability of claims 2, 4- 7 and 11 - 17 follows directly from the patentability of one of claims 1 and 10. Therefore, applicant respectfully asserts that claims 2, 4- 7 and 11 - 17 are likewise allowable and requests that the rejection of claims 2, 4- 7 and 11 - 17 be withdrawn.

### 35 U.S.C. § 103 Rejections

In the Office Action, the Examiner rejected claim 3 under 35 U.S.C. § 103(a), as being unpatentable over Fernandez et al (US Patent No. 6,697,103) in view of Monroe (US Patent No. 6,246,320).

An obviousness rejection requires a teaching or a suggestion by the relied upon art of all the elements of a claim (MPMP 2142).

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Fernandez et al. (US Patent No. 6,697,103) has been discussed above with respect to the 35 U.S.C. 102 rejection of claim 1 and this discussion is applicable here as well. Monroe cannot cure the defects of Fernandez et al. Therefore, Applicant asserts that the combination of Fernandez et al and Monroe does not teach or suggest claim 1. Claim 3 is dependent from claim 1 and includes all the limitations of claim 1. Therefore, the patentability of claim 3 follows directly from the patentability of claim 1. Therefore, applicant respectfully requests that the rejection of claim 3 be withdrawn.

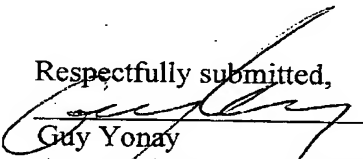
### CONCLUSIONS

In view of the foregoing amendments and remarks, the pending claims are deemed to be allowable. Their favorable reconsideration and allowance is respectfully requested.

Should the Examiner have any question or comment as to the form, content or entry of this Amendment, the Examiner is requested to contact the undersigned at the telephone number below. Similarly, if there are any further issues yet to be resolved to advance the prosecution of this application to issue, the Examiner is requested to telephone the undersigned counsel.

Please charge any fees associated with this paper to deposit account No. 50-3355.

Respectfully submitted,

  
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